

Exhibit H

Figure 18

Overview of Bank Overdraft Best and Good Practices, 2014

Banks ordered by number of best then good practices, and alphabetically when tied

| Bank name | Overdraft | | | | | | | Total best practices (out of 3) | Total good practices (out of 4) |
|---------------------------|-------------------|-----------------------------------|---------------------------------------|--------------------------------------------|------------------------------------------|---------------------------|------------------------------------------|---------------------------------|---------------------------------|
| | Best practices | | | Good practices | | | | | |
| | No ATM overdrafts | No debit point-of-sale overdrafts | No high-to-low transaction reordering | Limited high-to-low transaction reordering | Threshold amount to trigger an overdraft | No extended overdraft fee | Limited number of overdraft fees per day | | |
| Ally Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 3 | ✓ = 4 |
| Charles Schwab Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 3 | ✓ = 4 |
| OneWest Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 3 | ✓ = 4 |
| USAA Federal Savings Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 3 | ✓ = 4 |
| Citibank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 3 | ✓ = 3 |
| City National Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 3 | ✓ = 3 |
| First Republic Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 3 | ✓ = 3 |
| EverBank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 2 | ✓ = 3 |
| BB&T | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 1 | ✓ = 4 |
| First Citizens Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 1 | ✓ = 4 |
| Frost Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 1 | ✓ = 4 |
| HSBC | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 1 | ✓ = 4 |
| New York Community Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 1 | ✓ = 4 |
| Bank of the West | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 1 | ✓ = 3 |
| BMO Harris Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 1 | ✓ = 3 |
| Huntington Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 1 | ✓ = 3 |
| JPMorgan Chase Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 1 | ✓ = 3 |
| M&T Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 1 | ✓ = 3 |
| U.S. Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 1 | ✓ = 3 |
| Zions First National Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 1 | ✓ = 3 |
| Bank of America | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 1 | ✓ = 2 |
| BBVA Compass Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 1 | ✓ = 2 |
| KeyBank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 1 | ✓ = 2 |
| Signature Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 1 | ✓ = 2 |

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| Bank name | Overdraft | | | | | | | Total best practices (out of 3) | Total good practices (out of 4) |
|------------------------------|-------------------|-----------------------------------|---------------------------------------|--------------------------------------------|------------------------------------------|---------------------------|------------------------------------------|---------------------------------|---------------------------------|
| | Best practices | | | Good practices | | | | | |
| | No ATM overdrafts | No debit point-of-sale overdrafts | No high-to-low transaction reordering | Limited high-to-low transaction reordering | Threshold amount to trigger an overdraft | No extended overdraft fee | Limited number of overdraft fees per day | | |
| Associated Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 1 | ✓ = 1 |
| Susquehanna Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 1 | ✓ = 1 |
| Capital One Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 0 | ✓ = 4 |
| Fifth Third Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 0 | ✓ = 4 |
| TCF National Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 0 | ✓ = 4 |
| Wells Fargo Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 0 | ✓ = 4 |
| First Niagara Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 0 | ✓ = 3 |
| First Tennessee Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 0 | ✓ = 3 |
| PNC Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 0 | ✓ = 3 |
| RBS Citizens | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 0 | ✓ = 3 |
| Regions Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 0 | ✓ = 3 |
| Union Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 0 | ✓ = 3 |
| Comerica Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 0 | ✓ = 2 |
| Commerce Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 0 | ✓ = 2 |
| SunTrust Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 0 | ✓ = 2 |
| TD Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 0 | ✓ = 2 |
| Webster Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 0 | ✓ = 2 |
| FirstMerit Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 0 | ✓ = 1 |
| Sovereign/ Santander Bank | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 0 | ✓ = 1 |
| BOKF | ★ | ★ | ★ | ✓ | ✓ | ✓ | ✓ | ★ = 0 | ✓ = 0 |
| Banco Popular de Puerto Rico | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | N/A | N/A |
| East West Bank | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | N/A | N/A |
| Hudson City Savings Bank | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | N/A | N/A |
| People's United Bank | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | N/A | N/A |
| Prosperity Bank | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | N/A | N/A |
| Synovus Bank | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ | N/A | N/A |

★ Engages in this best practice ★ Does not engage in this best practice ✓ Engages in this good practice ✓ Does not engage in this good practice × No response

Source: The Pew Charitable Trusts

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